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SEND CORRESPONDENCE TO:  
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February 2, 2024

**VIA ECF**

Hon. Brenda K. Sannes  
Chief U.S. District Judge  
United States District Court for the Northern District of New York  
James M. Hanley Federal Building & U.S. Courthouse  
100 S. Clinton St.  
Syracuse, NY 13261

Re: *Doe v. Sigma Chi International Fraternity, Incorporated, et al.*  
Case No. 5:23-cv-1452-BKS-ML

Dear Chief Judge Sannes:

We represent the Plaintiff in the above-captioned action.

On January 29, 2024, three separate motions to dismiss were filed by Defendant Syracuse University (Doc. No. 55); Defendants Sigma Chi International Fraternity, Incorporated, Ethan Hirsch and Luke Rogers, in their capacities as President and Treasurer for the Psi Psi Chapter of Sigma Chi Fraternity, Sigma Chi Foundation, and 737 Comstock Avenue, Inc. (the "Fraternity Defendants") (Doc. No. 56); and Defendants Omicron Chapter of Delta Delta Delta and Delta Delta Delta (the "Delta Delta Delta Defendants") (Doc. No. 58). Plaintiff's Responses to the Motions to Dismiss are currently due by February 20, 2024, and Defendants' Replies to Plaintiff's Responses are currently due by February 26, 2024. We write to request an extension of time.

The three motions each raise a number of legal arguments that will require additional time for Plaintiff's counsel to research and brief. Furthermore, in addition to pressing court-ordered deadlines in other litigation, the current deadline falls on a week-long school holiday during which Plaintiff's counsel will be traveling.

We conferred with counsel for Defendant Syracuse University, the Fraternity Defendants, and Delta Delta Delta Defendants, and they do not object to extending the deadline for Plaintiff's Responses to the Motions to Dismiss by thirty days, until March 21, 2024.

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The parties have agreed to a unified extended briefing schedule for the Motions to Dismiss, subject to the Court's approval. Under the proposed extended briefing schedule, Plaintiff's Responses to the Motions to Dismiss would be due on March 21, 2024, and the Defendants' Replies to Plaintiff's Responses would be due on April 5, 2024.

This is Plaintiff's first request for an extension of time.

If these new deadlines are acceptable, we respectfully request that you "So Order" this letter. Thank you for your consideration.

Sincerely,



Olympias Iliana Konidaris

OIK/JNF/kmf

cc: All Counsel of Record (via ECF)

SO ORDERED:

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Hon. Brenda K. Sannes  
Chief U.S. District Judge

Dated: February \_\_, 2024